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W. X
P. L.
QUEEN of Sheba
Elizabeth ch.3
EUREKA !!!

G. (LEE VINCENT Yabrough)
O. M.M. 3° T.N. Jurisdiction
A. PHI !!!
T. U. III AMENDED complaint



pg 1 of 15

* U.S. Const. 7th amend.
Jury trial DEMAND
"Common Law"
* ART III Jurisdiction
(A.K.A. The Kings Bench)

* Summons an Complaints
For Marshal Service attached
Hence
= P.H. = M.M. 3° = 7th Chakra Activation

UNITED STATES DISTRICT COURT
Middle DISTRICT OF TENNESSEE

DEVORIS Antoine NEWSON

D.A.N. 
ALL RIGHTS RESERVED, WITHOUT PREJUDICE

Plaintiff, pro se,
JACHTN  BOAZ

v.

TRINITY SERVICES GROUP INC., ET. AL

Defendant.

P.H. H.A. H.T.

CASE No. 3:23-cv-00081

SACRED GEOMETRY

JUST-I-CE = JUSTICE

JUDGE RICHARDSON = HIGH PRIEST

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
UNDER 42 U.S.C. § 1983, 1985(●) (3)

RECEIVED

PHEONIX

JUN 27 2023

I. PREVIOUS LAWSUITS:

U.S. District Court
Middle District of TN

A. Have you begun any other lawsuit in either state or Federal court dealing with
the same facts involved in this action or otherwise relating to your
imprisonment? YES NO

EAGLE

B. If your answer to A is YES, describe the lawsuit in the space below.

1. Parties to the previous lawsuit:

Plaintiffs: N/A

Defendants: N/A

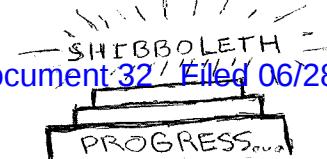
2. COURT: N/A

3. Docket Number: N/A

4. Name of Judge to whom case was assigned: N/A

JAH-BUL-ON

Case 3:23-cv-00081 Document 32 Filed 06/28/23 Page 1 of 32 PageID #: 156



5. Disposition: (dismissed – appealed – pending) N/A

6. Approximate date of filing lawsuit: N/A

7. Approximate date of disposition: N/A

II. PLACE OF PRESENT CONFINEMENT: Tennessee Department of Corrections
at Trousdale-Turner Correctional Center, 140 Macon Way, Hartsville, Tennessee
37074.

A. Is there a prisoner grievance procedure in this institution?

YES X NO _____

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? YES * NO _____

C. If your answer is Yes,

1. What steps did you take? UNSWORN DECLARATIONS, LETTERS, Grievances
Communication with Job Coordinator Chief Warden, TDOC Commissioner,
Gov. of T.N., CEO of Core Civic, Human Rights Commission, Secretary of the
State of T.N., Governor

2. What was the result? Job loss, Assaulted, Death threats, Nerve damage
Brain damage, vision loss, hearing damaged, Almost killed
Conspiracly to deprive me of my civil Rights, Grievances Never
Documented destroyed, UNLAWFULLY Extradited without due process of Law

D. If your answer to B is No, explain why not: _____

(Attach copy from each stage which shows results of grievance.)

E. If there is no prisoner grievance procedure in the institution, did you complain to the prison authorities? YES * NO _____

F. If your answer is YES,

1. What steps did you take? Followed the grievance protocol, File human Right Complaint's Etc.
2. What was the result? They were never given A number, never documented
Destroyed, Rejected, denied, no hearing ever given

III. PARTIES;

DEVORIS ANTOINE NEWSON A.K.A NEGASIX G.Y.

A. Name of Plaintiff: Trinette, et al.

Present Address: Trousdale-Turner Correctional Center, 140 Macon Way, **Void**

void valid
Hartsville, Tennessee 37074) El PASO COUNTY JAIL ANNEX, 12501 MONTANA AVE.
El PASO T.X. 79938

Permanent home address: NEVER WILL BE DISCLOSED, P.O. BOX preferably

B. Defendant: Trinity Service Group Et. AL

Official position: Corporation

Address of place of employment: 477 Commerce Dr. Oldsmar, FL 34677

1. ~~Bill Lee~~ Governor of T.N. ~~1~~ ¹, T.D.O.C. Commissioner, ² Ass't. Commissioner,
4. Governor of T.X. ², Sheriff Richard Wiles 6. CEO DAWN HININGER ³ T.D.C.C.
C. Additional Defendants: 7. CEO DAWN HAMMOND 8. T.D.C.C. WARDEN ⁴ Ass't. Warden
10. Core Civic Corp/Inc. 11. Mrs. Tarissa Fairbanks 12. Mrs. Waggoner 13. Miss Dally 14. Case manager
Ball 15. Unit Manager Robertson 16. Chief Harris 17. Captain Smith 18. CO#Spence 19. Chief of Security
20. ~~Recreational~~ ~~and~~ ~~recreational~~ 20. TRINITY Food Service.

IV. STATEMENT OF THE CLAIM(S):

Assertions

1. Plaintiff has been brutally assaulted or Almost Murdered on at least 5 different occasions while at T.T.C.C. under the Supervision or Custody of Cone, Civic.
2. Plaintiff as well as thousands of Inmates At T.T.C.C. have been exposed to deadly weapons, Cocaine, Weed/tobacco, Fentanyl, methamphetamine, corruption "official" while understaffed
3. Plaintiff asserts that Dangerous Conditions at T.T.C.C. were well Known to Defendants
4. Plaintiff claims for this suit will focus on Events From October 2022 on up.
5. Plaintiff will however start from the Beginning In order to give the Court on the public an overall overview of how all party's are involved
6. It was common Knowledge To all defendants within T.M. That the prison population at TTCC was heavily armed And Understaffed causing dangerous conditions.
7. This was clear from D.O.C. fines on investigation, Numerous civil suits, complaints on grievances by plaintiff or others as well as the unusual death rate and cover-ups in order to preserve employees positions. Or maintain the oppressive Tyrannical, Corrupt Jim Crow Status.
8. All T.N. party's had knowledge of the substantial risk of serious harm facing prisoners at T.T.C.C.
9. This knowledge was Based on Incident reports regarding the chrono, specifically, enumerated assaults, Reports By I.A. Investigations, Chief of Security Investigations,
10. This Including TTCC publicly available reports establishing a systemic Problem leading up to the murder attempts or assaults on Plaintiff or others.
11. Resulting in Hot weapons, Understaffing, Injuries, Brutality, Drugs, OVERDOSES, Fights, Stabbings or deaths.

12. An Average of 20 assaults a occurred from 2016 to 2023 many unreported Due to D.O.C fines an investigations. (corrections)

13. In 2020, the ~~DOC~~ Department of ~~Juvenile~~ ("DOC") opened an investigation on core civic into whether the conditions in Core Civic Prisons in T.N. For men This Included T.T.C.C. violated the eighth amendment of the U.S. Const.

14. The D.O.C Investigation Related to whether (1) Core Civic adequately Protects Prisoners from physical harm, Sexual abuse at the hands of prisoners, understaffing of employees, and providing Prisoners with safe living conditions at prisons including T.T.C.C., Overflow of weapons

15. All Top officials Received notice of the D.O.C. Investigations which resulted in Core Civic Being fined over 2 million dollars

16. It became Common Knowledge By Leo Dan Hinlinger, T.D.O.C. Commissioner, Governor Bill Lee that the prison population at TTCC was heavily armed and under staffed

17. Defendants also Knew that contraband search protocols at T.T.C.C. Due complaints By Inmates, civil litigation initiation an results from investigations external as well as Internal

18. Through all the above Defendants Knew or should have Known that T.T.C.C. under CoreCIVIC Supervision was a death trap ... where Inmate murders were the norm.

19. D.O.C fines an investigations, Core Civic Mass prison lockdowns within T.N., personal observation, internal communications, use of force reports, Incident Reports, medical Reports an external sources such as previous civil litigation put parties on notice of the culture of abuse of prisoners By violence an understaffing,

20. Prison BEATINGS, stabbings, overdoses, an rapes were epidemic, violence an terror Reigned and the threat of assault was constant,

21. D.O.C. Fined Core Civic 2 million for short-staffing and other contract violations at T.T.C.C. IN 2018

22. T.N. States 2020 Performance Audit of DOC 4 prisons CoreCivic operated for DOC - TTCC, Hardeman CCF, South Central CF, and Whiteville CF - There a total of 3,052 "Class A" incidents "Involving Serious Risk to the Facility or Community"

23. These class A incidents occurred From October 1 1st 2017, to April 2019, 12th

24. During this same time, there were JUST 1,739 IN The states other 10 Lockups combined.

25. In the Boaz Pleasant - Bey v Tenn. USDC (M.D.) Tenn. J. pl.
- Aintiff evidence contained statements from CoreCivic personnel addressing a shortage of guards at the prison

26. Core Civic has a ~~policy~~ practice of maintaining staffing levels insufficient to ensure that the Plaintiff an all other inmates safety from ~~violent~~ prisoner Attacks,

27. This practice has been ongoing for at least 5 yrs.

28. Core Civic has had a ongoing practise of leaving W-unit pod doors unsecure an allowing inmates from anywhere to enter pods there not allowed in or assigned to.

29. They have allowed this even when inmates are sound asleep in the beds late at night. Which was the moving force behind January an Feb. incidents of 2023

30. This ~~practices~~ are responsible for my physical an mental injuries, including Brain damage, Black out's, uncontrollable brain ~~spas~~ migraines, sleep paralyze, Nose Bleeding "Random" Blurred Vision, Ear drum Damage, permanent nerve damage, P.T.S.D, an Insomnia, neurological damage

31. All claims made herein against T.N. defendants are due to common customs an practices of the following, Core Civic an its employees of the following

32. Failure to separate violent inmates from non-violent inmates

33. Understaffing, lack of Training, failure to segregate dangerous inmates

34. failure to conduct adequate searches for weapons, deliberate Indifference To the health an safety of Inmates.

35. Around 2-21-21 while incarcerated unlawfully at T.T.C.C. after quarantine protocol.

36. Plaintiff through grievance/unsworn declaration notified ~~to~~ The Governor of T.N., T.D.O.C Commissioner, CEO Dan Hininger, and T.T.C.C. Chief Warden of his reason for being unlawfully incarcerated. In the worst Prison in the state of T.N. (Also notified was the Governor of T.X.)

37. Plaintiff stated he was not supposed to be in prison

38. That his cases In madison County 19-880 an 19-879 were still pending Due to him filing a timely T.N. Crim. of P. 32 (F) motion To withdraw guilty plea

39. That Judge Kyle C. Atkins of the 26th Judicial District Ct. at Jackson T.N.

40. Along with ~~Non~~ pro-tempore Assistant D.A. Benjamin Mayo, an Madison Count Sheriff orchestrated a false prison transfer with the T.D.O.C commissioner an CEO Dan Hininger's approval.

41. He also stated that his attorney Kortney Simmons was paid by Judge Atkins an the D.A. To allow it to happen, an to attempt frivolously to convince the plaintiff that everything was legal.

42. He stated the Unlawful Prison Transfer based off of knowingly fraudulent Invalid void Judgment forms signed By Judge Atkins an Assistant D.A. Ben Mayo In Retaliation to silence him.

43. By any means necessary To cover-up the fact that Members of El Paso Sheriff's department (I.E. Sheriff Richard Wiles an deputy Jaime Hernandez Sr.) Conspired with Members of Madison County Sheriff's, Sheriff Mehr, Sheriff Deputy Ben Moyer an Deputy ~~Richard~~ Nickell Jacobs.

44. In which I was to be ~~assassinated~~ on the early morning of March 31st 2019 In Jackson T.N. By Deputy Nickell Jacobs

45. Due to my failure to make to make a drop in Memphis T.N. for Sheriff Richard Wiles an Deputy Jaime Hernandez Sr.

46. This drop consisted of 2 kilos of Pure Colombian cocaine, 10,000 Quadruple stack meth based on MOA Based Ecstasy pills, \$25,000 dollars cash, 2 Ar-15's, 5 hundred round drum clips, 5 nine millimeter handguns with modified switches

47. 4 Baby Draco's with modified switches, Blue tip ammunition as well as green tip ammunition.

48. Due to too many adult witness's including Deputy Jaime Hernandez Sr's, daughter IRIS MAE Flores, Plaintiff's fiance at the time.

49. Deputy's Moyer an Nickell's went with plan B an instead falsely ~~acted~~ alledged the car was stolen from Dallas T.X. In which the plaintiff was in possession of.

50. After knowing full well Deputy Jaime Hernandez's Sr. Son Jaime Hernandez Jr. Purchased the vehicle in elpaso T.X. In early March 2019.

51. In which the deputy's Jumped in the vehicle Drove it to an undisclosed location an confiscated the drugs, money, an guns in which was privately returned to Sheriff Richard Wiles an Deputy Jaime Hernandez Jr.

52. In retaliation the plaintiff contacted M.C.S.O. Recorded line an report that the Sheriff's of Madison County entered 436 Pipkin Rd. Unlawfully at around 4 to 5 am

53. In which in front of 3 adult women the Sheriff Deputy Ben Moyer and Deputy Nickell Jacob unlawfully obtained the vehicle an drove the vehicle from the premises

54. In retaliation sheriff Mehr of M.C.S.O. ordered Moyer an Nickells issue an unlawful General sessions warrant orders that a S.W.A.T RAID Issue upon the plaintiff's arrival at 436 Pipkin Rd.

55. In which under cover informant Rodrekious Woodruff and Arron Morgan Junior was to notify the Sheriff upon plaintiff entering that residence In which he was to be shot during the Raid

56. Plaintiff was notified due to his fraternal ties to the prince hall organization in advance an avoided the assassination attempt again.

57. Which led to the orchestrated ~~attempt~~ conspiracy Between the Judge, D.A. Mayo, Sheriff mehr, T.D.O.C. Commissioner, and CEO DAN HININGER To orchestrate a unlawful prison sentence for this plaintiff Chief Warden

58. In Retaliation, the ~~orchestrated~~ ordered that I be placed in E-unit the most dangerous prison unit on T.T.C.C. Compound

59. Within 2 hrs I was almost Beat to death in which I suffered concussions an a dislocated Broken JAW

60. This led to Suppressing of incident reports made by plaintiff By T.T.C.C. Chief Warden

Rev. 7/1/2016

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61. Multiple Operations due to Core Civics Refusal to provide medical attention for over 3 months leaving Plaintiff to suffer unimaginable pain.

62. The led to the plaintiff having to have his jaw medically broken again in which resulted in infection in another operation

63. This was due to core civics custom of inadequate and or understaffing of medical doctors as well as equipment

64. The injuries occurred due to core civics custom of understaffing employees which resulted in on 500 ~~gears~~ inmates controlling a running there own pods, while

65. One officer sitting in the rotunda area does nothing but enter the pods to count every 2 hrs.

66. To finish the Job on the Plaintiff while in the medical Unit for his injuries Chief Warden sends the Main Gang member who was Identified to have initiated the Attack on the plaintiff

67. To reside in the medical Unit in pod in which the gang member stated he was ordered by the chief Warden to finish the Job.

68. Instead the plaintiff paid the gang member \$600 in stimulus money to not finish the Job as ordered by the Chief Warden of TTCC.

69. It would be another year before plaintiff would have the physical and mental strength to speak out again concerning his situation.

70. In between this time the plaintiff filed grievances concerning this matter and gave notice to the D.O.C. Commissioner, Chief Warden of TTCC, an CEO of Core Civic

71. Governor of T.N. an Director of D.O.C., an CEO of Core Civic

72. I notified them of the extreme staff shortages, over flow of violence, weapons and drugs

73. I stated that these things had not only impacted my physically "literally" but many others inmates as well

74. I stated through research I discovered this situation had been allowed to continue at TTCC for years resulting in D.O.C fines an investigations, deaths of prisoners.

75. I stated that they had obligations as the higher authority's to take action to prevent the deadly conditions that was common knowledge an common ~~practices~~ practise at TTCC.

76. I stated that these common customs almost cost me my life an health as it has to so many others at TTCC.

77. In response the Gov. of T.N., CEO of Core Civic, D.O.C. Commissioner, an Director of D.O.C. including the Chief Warden. Ignored me.

78. By silence an in action of these party's, I presumed that my Black life didn't matter

79. Even though I clearly stated in my grievance, ~~unsworn~~ declarations that these party's had an administrative duty "ministerial" By there oaths of office...

80. To TAKE action to prevent prisoner on prisoner violence, unstaffing of employee's who were not properly trained creating literal death traps at TTCC. For inmates as myself

81. I made it a point to note that Even President Joe Biden had Nothing good to say about Core Civic, Rev. 7/1/2016

82. I also stated that I as a prisoner with regard to safety had a constitutional right to be reasonably protected from constant threats of violence,

83. I stated that this meant that I did not need to wait until another murder attempt or violent attack happened again to me, before obtaining aid, assistance, an relief from them all.

84. I stated that failure of these officials to take actions would result in 8th amend. U.S. Constitution violations

85. that I clearly allegede to them that the deprivation against me and thousands of other prisoners was objectively as well as sufficiently serious.

86. I stated that not only by my Notice but past events leading to civil suits an fines,

87. That All officials know an have known of and have disregarded the excessive risk to inmates at TTCC, including myself. Health an Safety

88. That the officials were both aware of the facts from which the inference could be drawn that a substantial risk of serious harm exists, an that it is clear from Investigations an reports,

89. That they have clearly done the following

Case 3:23-cv-00081 Document 32 Filed 06/28/23 Page 11 of 32 PageID #: 166

90. Rather Ignored me.

91. In the early days of June 5th 2022 I had Lt. holmes of T.O.C.C. Check my status custody level
 92. In return he informed me that I was S.T.C.C. as a Blood Gangmember
 93. I in turn informed him that was impossible my soul ties lied with the Fraternal order of the
 Princehall organization.
 94. I then filed a title VI against S.T.C.C. officer McLoyd asserting discrimination, malignant
 Nefarious profiling due to Being Black with tattoos
 95. I explained the esoteric symbol's on my body to the profane T.O.C.C. TITLE VI Coordinator
 Assistant Warden Jacqueline Normin.
 96. In retaliation Warden Normin ordered S.T.C.C. McLoyd an dog-man K-9 officer to enter
 my cell in unit B while I was at work in the Dining hall ~~eateteria~~
 97. Collect legal documentation with my name on it an use it to forge my name on a clearly
 invalid voluntary statement.
 98. STATING THAT I voluntarily admitted to being a gang member
 99. They then in retaliation told my cellmate and other known violate crips known for stabbing
 people to death that I was a blood member.
 100. This was after they had just killed a blood in this pod on camera less than 3 months prior
 101. I initiated another title VI concerning this matter in turn.
 102. While coming from the law library in the ~~the~~ early July 2023 in retaliation a murder attempt orchestrated
 By assistant warden Normin, Case manager Bail, STC McLoyd, an Homosexual sergeant female Garcia
 103. As I approached the Unit B pod door I noticed 2 crips close to the door one (A.K.A Sneaky)
 told me to have the rotunda officer to open the door
 104. The officer refused which was extremely unusual seeing as how I lived in the pod.
 105. Later Case manager Bail arrived an opened the door he then stood in between the door and
 asked me was I coming in
 106. At this time Sgt. Garcia started to order me to step in the pods
 107. One of the 2 crips pulled out his knife on camera right Beside Bail staring at me
 108. I then refused to go into a death trap seeing full well that All staff witnessed what I just
 saw.
 109. Sgt. Garcia in retaliation threw me in medical an stated I refused a cell assignment
 110. After I spoke with the Captain an attempted to file a B.I.C an requested I be allow to contact
 my dad for my own safety
 111. The Captain reviewed the video footage a confirmed my story
 112. He then asked me not to make it a big issue an stated In turn he would have me moved
 to minimum custody open bay that same night
 113. He stated I needed to keep the matter discreet for my own safety seeing as how I stirred up
 a hornets nest.
 114. In return I exchanged a symbolic token handshake with him an complied.
 115. In early August 2022 after working in the dining hall about 7 months I came to learn that my
 work credits were not being processed. By Fairbanks an Wagner,
 116. I also had enough of the discrimination an injustices that I had seen imposed on other Inmates
 an particularly against myself By Imprudent food stewarts Director fairbanks an Wagner,
 117. I addressed these issues with both stewarts.
 118. I stated I noticed several discriminatory practices against inmates including myself, including
 Spolice out exercising there 1st amendment right to freedom of speech. Without due process of law.
 119. Concerning Allowing gang members In Wagner and fairbanks close circle to run the kitchen
 120. Transport unlimited amounts of T.O.C.C. meat products through carts By Head cook Larry
 121. Personally transporting them to units.
 122. Yet they would fine an or prevent assigned kitchen workers from working without a write-up
 or a proper hearing.
 123. All because they would either file grievances or address the situation, with the stewarts
 customs an policies.
 124. Both Fairbanks an Wagner told me that if I didn't like it to quit, they made there own
 customs and policies.
 125. I responded that there closest workers are allowed to make and file their own grievances
 towards T.O.C.C. as well as sell them.
 126. Yet you fine inmates that work hard for having extra amounts of sugar. An for speaking out against

accordingly

certificate of service

i have caused a true and correct copy of the rule 60 motion to be filed with the federal district court clerk along with additional copys for defendants one to be mailed back to me by u.s. mail this 8th day of janurary 2023 signature :

unfair treatment

128. In return On August 10th 2022 I filed a grievance/unsworn declaration concerning this injustice to Trinity food CEO, CEO Da Hinninger, T.D.O.C. Commissioner, Chief Warden of T.T.C.C an Chief Harris as well as Job Coordinator Blackwell, And close friend of Fairbanks Assist. Warden Normin, as well as Job Coordinator Blackwell, And close friend of Fairbanks Assist. Warden Normin.

129. In this grievance/unsworn declaration I stated everything I stated above in Claims 116. - 127.

130. I also stated the Core Civic employee Kitchen officer Leon consented to an enforced these unjust actions.

131. I was ignored by all but Job coordinator Blackwell an Fairbanks ~~Detention Center~~

132. Fairbanks in early October 2023 stated she was aware of my allegations made to the chief warden

133. And her Boss CEO hammond of Trinity Food Services

134. She stated that if I valued my life and didnt want anything as far as accidents to happen to ~~me~~

135. That I should keep my mouth shut.

136. She stated all Trinity Employees Wagner an daily were on board including CO# Leon services.

137. She stated that if she gave the word any inmate within her circle would permanently put me out of

138. She stated that I should do what's best for my health an not return to the kitchen

139. I in turn stated that I had no fear of her demonic cult like inner circle.

140. That I being a traveler in search for wages had over 25 million fraternal Brothers as well as SISTERS all across the Nation.

141. Some at the very top of the hierarchical Judicial pyramid, that we all walk in the light.

142. That if Fairbanks was ashamed of the truth she should take action.

143. I assured her that if I was truly in "distress" that I would receive aid an assistance.

144. I then showed her a human angle an walked away.

145. I THEN FILED a grievance/unsworn declaration given notice of the above colloquy an actions through T.T.C.C., TDC Commissioner, CEO HAMMOND, CEO Hinninger, an the Governor of T.N., D.O.C. Director I asserted they had a administrative duty to take action to prevent the immediate threat against my life by Trinity Staff an core civic employees.

146. Not one of the officials disputed the allegations Nor did they take action to prevent harm, an met by Trinity Staff Wagner an daily.

147. She stated that they had warned me about trying to be a (civil negra fighter)

148. On October 10th 2022 around 6 to 7 p.m. I was called into the office of the kitchen AREA an met by Trinity Staff Wagner an daily.

149. She stated that this was the final warning to stay out of the kitchen an never return.

150. I begin to cry out against this injustice through Chief Harris and Job Coordinator Blackwell through Grievance an Request forms.

151. I also again gave notice to the Director of D.O.C., Governor of T.N., CEO Hammond, CEO Hinninger and the T.D.O.C. Commissioner,

152. Again I requested they take action, to no avail, even though they had an administrative obligation to prevent imminent threat.

153. Blackwell however advised ~~me~~ keep attempting to go to work so that it would be on CAMERA this INJUSTICE, she stated in turn,

154. Blackwell can send you up here and I'll send your Black Butt Back

155. Continue's of line 153.

156. The claim here goes with line 151. - I stated to Wagner that Blackwell would not allow this INJUSTICE, she stated in turn,

157. Blackwell can send you up here and I'll send your Black Butt Back

158. Upon my ~~last~~ last attempt in Early November of trying to work I was met by Kitchen Officer Leon (CO# Leon) Officer Leon. This occurred on 11-18-22

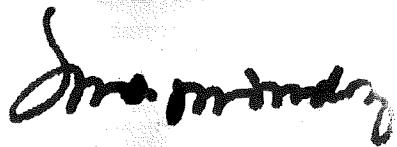
159. He smiled at stated that I just wasn't going to learn

160. He then said no one likes civil negra fighters around here at T.D.O.C. making trouble and that I would not be allowed back in the kitchen

161. He then said no one likes civil negra fighters around here at T.D.O.C. making trouble

162. He smiled even more at stated he had a meeting for me in about 10 minutes from Wagner Case 3:23-cv-00081 Document 32 Filed 06/28/23 Page 15 of 32 PageID #: 170

Thank you for your attention.
Sincerely,



MARIA SALAS-MENDOZA
Judge

cc: Public Defender's Office
District Attorney's Office

163. Once given to me It falsely stated I was fired on 10-10-23 for stealing a Pan full of onions, stating she witnessed this

164. I then looked intently into the eyes of kitchen officer Leon an stated it was not wise to involve himself in this malignant matter of obvious subterfuge.

165. Coming from depraved human beings of the lowest frequency's walking in ignorance.

166. Leon replied "yea, yea" save it for someone who cares even Fairbanks fired you an she's extremely Black, Enjoy your day.

167. He then stated "oh I almost forgot Fairbanks, Wagner, an daily said if I saw you again to remind you not to forget to sleep with one eye open.

168. At this stage I made contact with chief harris an gave her the write-up in which she stated she would review the camera.

169. I also informed her of the continuous threats, along with Governor Bill Lee, Director of DOC, TDOC Commissioner, CEO Hammond, CEO Dave Hammiger, an Chief Warden off T.T.C.C. By grievance unsworn declaration

170. A few weeks later near the end of December I was ordered by chief harris to return to the kitchen, in which I was given a raise an a New Job position of Cook Prep. This occurred on 12/30/23

171. When I tried to retrieve the retaliatory write-up from chief harris she refused to give it to me, stating there was no need to create waves I got my Job back.

172. On 1-10-23 from 2:00 am. to 5:00 am. I was allowed to work during this Time Trinity.

173. Food Stewart Daily Initiated an Incited a riot against me on video

174. She told the Kitchen workers Larry, A.J., Wom, an several others to keep me out of her face an her name out of my mouth.

175. These workers were extremely aggressive an violent they wanted to know how I got my Job back after they assisted in getting me fired.

176. On camera I was threatened by the inmates to be beat, stabbed, and jumped, authority.

177. This was all due to the fact that I was allowed to work against the Director Fairbanks

178. Through all of the threats of violence an assaults made I maintain my composure

179. This further infuriated Daily you can see her on video getting very upset, they her Demonic attacks on me had know affect.

180. She eventually snapped an called me over to line one on video

181. She stated that I should never have come back to the kitchen an that I should beware of of the hit that would be sent on my life.

182. She stated that I knew full well that I had been warned by Leon, Fairbanks, and Wagner what would happen if I came back.

183. She then asked me to leave the kitchen in which I complied.

184. While waiting on the T.T.C.C.s kitchen officer who had left her assigned post in the kitchen

185. To venture off somewhere on the compound.

186. I waited in the dining hall yet that was short lived due to Head kitchen worker Larry

187. Continuously turning off the dining hall light in order to initiate a assault against me using himself, A.J., Wom, and ~~Mississippi~~ Mississippi

188. However I continued to turn the light on so that T.T.C.C. security camera's could view there Idiotic attempt at assaulting me.

189. Moments later I was allowed to leave on camera during count time

190. Later that same evening I alerted Job Coordinator Blackwell while at the law library were

191. I spent most of my time perfecting my legal craft.

192. I not only informed Blackwell of the incident that morning, I told her the Kitchen was not the same.

193. I told her all my allegations could be proven on video.

194. I stated that you can even see on line 3 were I am located that Mississippi is clearly groping the heavy set Samoa Trinity Workers bottom on camera

195. I stated the cult like depravity that existed in the kitchen was of the darkest all lowest vibrations I ever felt.

ME speaking out against police taking place at T.T.C.C.

196. Blackwell told me told trinity food services staff had been warned several times to stop violating T.D.O.C. Policies with there own customs, she stated T.D.O.C. Commissioner as well as the chief Warden had been notified.

197. This too is a camera as well.

198. Hours later on 1-11-23 while I'm completely sleep at or in between 3:00 to 5:00 a.m., location WC-133

199. I am snatched from my top bunk an Brutally Beat by 2 assailants, they state while beating me that I should have stayed out of the kitchen like fairbanks said.

200. The assailant later identified as a kitchen worker pulls out a knife in an attempt to stab me in which we struggle over.

201. Cott spence then enters the pod which causes the attacker with the knife to look back

202. At that time I knocked the knife under 129's bunk

203. Cott spence sees this altercation yet keeps walking and refuses to get involved P. Cott in which he has another knife

204. Once he leaves the assailant goes around the corner on video and retrieves his ~~knife~~

205. Both assailants tell me to leave or die, in which I'm stunned to the point of confusion

206. I immediately comply this is all on video

207. Once I exit the pod the assailant who was not supposed to be in our pod but was let in by Cott spence goes back in his pod B

208. I then asked spence why he let him in and why didn't he do anything or call for back-up

209. He stated that I knew damn well that he is only one guard with no help watching 500 inmates by himself

210. I asked him why the hell did he break security protocol and have the pod doors OPEN and unsecure in the middle of the night?

211. He stated I knew damn well that was the custom for as long as I had been in W-Unit, that I was still alive to keep my damn mouth shut and go back in the pod.

212. I stated it is clear he had something to do with it seeing as how he ironically had all the lights turned off in the Rotunda

213. He stated I knew the consequences of my actions when I started causing trouble for Trousdale employees. I had been warned several times.

214. I stated I needed medical attention that I had hit my head pretty hard coming off the bunk

215. I refused and stated he needed to do his job.

216. He then pushes his speaker and calls for back-up says he has a man refusing a cell assignment.

217. This he tells to Sgt. Botton.

218. I respond to him stating he is the lowest form of the human race.

219. I then respond by telling him he'll be sued if he sprays me

220. I then was able to explain to Sgt. Botton what took place, I also informed him that spence was lying in order to cover-up his involvement.

221. Sgt. Botton immediately took me to medical and contacts his chain of command Captain Smith.

222. While waiting on medical attention Captain Smith comes and questions me about the incident reason and places me into a intake lockdown cell and tells the staff I'm R.G.H.

223. After 2hrs I'm finally able to convince the guard that I am not R.G.H. I was in medical

224. Before being released I make several copies of the incident report, the nurse is given a copy and places one in my medical record, Captain Smith, Assistant Warden, Norman Unit-Manager, and Captain Smith.

225. Unit-Manager Robinson calls me into her office and reviews the video footage with me and confirms my Incident Report.

226. I state I need to be shipped to a safe facility. That this facility is a death trap.

227. I state no doors are ever secured, inmates are allowed to walk around freely, for years, an understaffing of violence is common, and attackers through her own investigation.

228. After P. Cott spence, he has a copy of the attack through her own investigation.

Review History of Assault

Review Victim Sensitivity

Review History of Sex Offense

Review Conditions of Supervision

234. She establishes the identity and location of both the attackers
235. One's located in pod WC, my location the other in WB, yet she takes no action against these violent offenders.

236. Instead she ask me IF I would like to be placed in P.C.

237. I state though my life is obviously in danger seeing as how you by your actions are refusing to take action against the known assailants...
238. I cannot afford to be placed in P.C. with no access to a law library
239. I state that it is common knowledge that P.C. is one of the most dangerous places to be at T.T.C.C.

240. Numerous Inmates have been killed in P.C. at T.T.C.C.
241. I state that she along with every official at T.T.C.C. are aware of the numerous deaths that have taken place due to the drug trafficking, Overflow of weapons, understaffing of security.

242. Allowing gangmembers to run there ^{own} pods, an surely had I been killed early this morning my death as well would have been covered up.

243. She stated that's probably true but what can I do I'm a Unit Manager.
Prisoner on prisoner violence
244. I responded stating that Robinson was being deliberately indifferent to this clear act of

245. She responded "cry me a River"
246. I responded you are aware that risk of serious harm exist against me an you are clearly disregarding that Risk By your callous Response on actions.
247. She responded By Asking "who are you supposed to be Johnny Cochran?"
248. She then stated "Maybe If you learn to close your mouth an stop making trouble for T.T.C.C. employees things like this wont happen."
249. I demanded an emergency transfer
250. She responded By stating "Is that supposed to be a joke" "get out of my office"
251. I then on 1-11-23 Filed another grievance /affidavit Unsworn Declaration to the T.T.C.C. Governor Bill Lee, T.D.O.C. Commissioner / Chief Warden of T.T.C.C., CEO Hammond, and CEO Hininger as well as to the director of D.O.Cs.
252. I informed them of everything I stated above from line 159 to 251
253. I also notify them that 1 of the assailants who was located in my unit admitted on 1-11-23 that Dir. Fairbanks paid him an the other kitchen worker in heroin...
254. In exchange they agreed to kill me in my sleep. He Stated CO#spence was aware an had been paid as well to look the other way.
255. The attacker was put out of the pod by other inmates this someday due to him being High on heroin, this is all on video.
256. I charged every supervisor by there oath of office to take action...
257. I stated there were a painfully clear causal connection established from the documented abuse at T.T.C.C.'s
258. History of widespread abuse ~~abuse~~ an that I personally have put all supervisors on notice of the need to correct the alleged deprivations...
259. Yet they have failed to do so an it was clear that there improper customs have resulted in deliberate Indifference to not only my rights By every inmate at T.T.C.C.
260. I specifically noted the dangers of T.T.C.C.'s entire compound, the mixing of close custody, medium and minimum inmates Based on the management customs an practices...
261. How they place individuals with behavior problems together in ~~single housing unit~~ in general population, lack of programming opportunities...
262. I noted that the last 4 deaths at T.T.C.C. are a manifestation of the safety problems this kind of management creates.
263. I warned that Weapons, cocaine, Meth, fentanyl, violence, death, Murder, an O.D's continues to contribute to serious safety concerns as well as official corruption
264. That contraband searches continue to be sporadic and ineffectual, Despite these deficiencies, these supervisors failed to take action to improve supervision an monitoring at T.T.C.C.
265. I stated Due to the attack I suffered Black out's, uncontrollable migraines, insomnia, P.T.S.D an extreme paranoia
266. I then reprimanded the supervisors on notice of the exsistance of the culture of abuse created By T.T.C.C. an corporal punishment, as well as inadequacies of the existing customs an practices
267. The res

30

268. T.T.C.C. Management fostered the culture of violence By failing to provide an established grievance system

269. Failing to properly investigate and discipline acts violence, discouraging victims from reporting incidents of violence, and retaliating against prisoners such as myself who reported violences

270. In my current physical condition medical treatment was not provided due to inadequate medical care, staffing and equipment.

271. This too all supervisors did not dispute, yet just as well, took know action.

272. On or about Feb 9th 2023 from 4:00 pm to 6:00 pm. The guard let a man by the name of Stephan Beasley in our unit/pod WC in which it was known he was out of place.

273. The man having a life sentence for the murder of his wife an a Extreme history of violence, approached me with a knife tucked in his pants.

274. He said he had a message for me on camera from Chief Warden on Food Stewart Fairbanks, Wagner, an Baily.

275. I asked what it was an I was hit on video by 2 devastating blows causing hearing damage to my left ear nerve damage under my left eye, and increased vision damage in my left eye.

276. He stated that I was to keep my damn mouth shut.

277. He then freely was let out the unit by the same guard.

278. This took place on video in front of over 100 inmate witness's.

279. I tried to get Case manager Bail To do a incident report an provide medical attention due to my injuries.

280. He refused said he wasn't getting involved I was causing to much trouble.

281. For 3 days I would seek his assistance due to be on compound lockdown

282. I tried Unit manager Robinson she also stated she wasn't getting involved as well.

283. On 2-14-23 between 10 am to 1:00 p.m. on camera I met with Chief Harris during court in WC pod.

284. I gave her the 51-C report told her no staff would get involved, and that I needed copies of my 51-C.

285. Chief Harris took my 51-C an never returned, took action to protect me nothing.

286. Around March 3, 2023 I was informed that I had a detainer out of El Paso for a pending charge case # 20110001149 by case manager Bail

287. I contacted Big certified mail El Paso Judge Mendoza, Governor of TX, Sheriff Richard Willes of El Paso, T.D.O.C Commissioner, Chief Warden of T.T.C.C., Governor of T.N.,

288. I informed all party's that they were committing fraud.

289. I produced Federal ICAOS Documentation showing that I was convicted in 2015 for this crime an transferred to Kansas.

290. Where I was placed on parole under K.D.O.C as a convicted felon for this charge My statements,

291. I produced Parole documentation from K.D.O.C, the Governor of Kansas verifying

292. I also informed them that any and all state officials involved are in violation of 18 U.S.C. 241 an is a federal crime.

293. Case manager Bail around April 1st 2023 came to me and spoke to me in private

294. He stated due to the constant complaints I had made against T.T.C.C. employees

295. And the threat of the potential collateral attacks against T.N. state officials including the T.D.O.C Commissioner

296. It has been worked out to get rid of you, you will receive no due process of law no court hearing Nor a chance to contest the extradition

297. Sheriff Richard Willes has been compensated an is on Board, he stated I would be extradited

MISCELLANEOUS NUMBERS
KS33111037

UNKNOWN

UNKNOWN

HEIGHT	WEIGHT	DATE OF BIRTH
5'09"	169 (2008-11-22)	1986-09-01
5'09"	169 (2009-02-02)	1986-09-01
5'09"	169 (2009-04-30)	1986-09-01
5'09"	169 (2009-04-30)	1986-09-01
5'09"	169 (2009-10-30)	1986-09-01
5'09"	169 (2010-12-27)	1986-09-01
5'09"	160 (2012-01-25)	1986-09-01
5'09"	160 (2012-01-25)	1986-09-01
5'09"	160 (2012-01-31)	1986-09-01
5'09"	169 (2012-02-08)	1986-09-01
5'09"	169 (2012-02-27)	1986-09-01
5'09"	169 (2012-02-28)	1986-09-01
6'02"	160 (2012-04-02)	1986-09-01
5'09"	169 (2012-05-30)	1986-09-01
5'09"	169 (2012-06-01)	1992-04-24
5'09"	165 (2012-08-07)	1986-09-01

298. He stated that had I not made complaints against fairbanks, wagner, Darby, Smith, Spence, The Warden or the Commissioner, this may have been prevented

299. The bottom line is they want you gone in order to prevent this from going any further

300. I stated this was a federal crime an a clear criminal conspiracy to deprive me of my Rights.

301. He stated that one day soon I would learn that when money is involved the law doesn't exist.

302. On 4-3-23 I was called to intake were I was met by an unknown plained clothed U.S. officer allegedly from U.S. Dept. of Corrections.

303. He stated someone paid some big money to the U.S. Dept of Corrections Agency To fly me to el paso Sheriff's dept that day.

304. I was told to sign certain release forms in which captain Smith erased or rather crossed out my signature on the documents.

305. Due to it being A Free an Excepted Masonic Esoteric Symbol, she erased my hand marked signature as a sign of disrespect for filing a lawsuit against her.

306. Since then I've been unlawfully Incarcerated under Sheriff Richard Wiles Denied access to courts or proper medical attention for the injuries sustained at Trousdale.

307. I sought medical help several times with E.P.S.O through Request an grievance due to Brain Injuries.

308. I was denied a Doctor "neurological" with equipment.

309. I've sought Access to Courts through Request an grievances concerning the case with E.P.S.O. (Law Library)

310. Requested Case law, Attorney Phone calls, paper, pen, copy's, Certified mail for legal correspondence

311. Envelopes, several times through Request an grievances to no avail

312. As I have observed All inmates are denied these rights here at E.P.S.O

313. I personally have addressed Sheriff Richard Wiles several times concerning access to law library and the obvious lack of adequate training of staff when it comes to access to courts,

314. He refuses to act or respond.

315. I continue to suffer from Sleep Paralyze, Migraines, Nose Bleeds, an Blackouts

Sig John m. m. 36
 Deacons Room # 9596176
 12501 Montana Ave.
 El Paso T.X. 79938

If the person signing is not petitioner, state relationship to petitioner and explain why petitioner is not signing this petition. _____

Compensatory

V. RELIEF REQUESTED:

Count I 1. *Core Civic: \$10,000,000 Monetary damages \$5,000,000 punitive \$5,000,000 "U.S. 8th amend. violation, "Deliberate Indifference to Safety, Failure to Protect", A. "Deliberate indifference to medical needs", "Understaffing", "Failure to properly Train Staff" "Cultivating Unsecure, Violate Conditions) Against Prisoners

Count II 2. *Core Civic: \$10,000,000 (punitive damages) (1st & 4th Retaliation claims U.S. Const. Amend)

CEO Hammond

Trinity Food Inc 3. B. Count III 8th amend. Failure to Protect Claim Based on deliberate indifference to plaintiff's Individualized Risks pursuant to 42 U.S.C. 1983 against Core Civic \$10,000,000 punitive an compensatory (Core Civic)

CEO Hammond

Trinity Food Inc 4. Count III C. *Ceo Dan Hinninger 8th Amend Failure to Protect Claim Based on Deliberate Indifference to Prisoners" \$10,000,000 punitive an Compensatory (Individual Compacity)

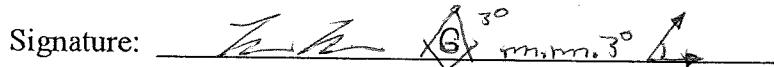
CEO Hammond

Trinity Food Inc 5. Count II D. *Ceo Dan Hinninger 8th Amend Failure to Protect Claim Base on Deliberate Indifference to Plaintiff's Individualized Risk, Medical Care, understaffing, failure to train staff, cultivating violent culture. \$10,000,000 punitive an Compensatory (Each Individual Compacity)

Count VI * CEO DAN Hinninger 42 U.S.C. 1985 (2)(3) Conspiracy to deprive plaintiff of his 5th, 14th U.S. Const. Rights to substantive and procedural Due Process of Law \$10,000,000 punitive damages \$10,000,000 compensatory (Individual Compacity)

Governor of TN. Governor of TX. Sheriff Richard Wiles T.D.O.C. Commissioner Warden of T.T.C.C. Case manager Bail I or We do hereby certify under penalty of perjury that the above complaint is true and accurate to the best of my or our knowledge, information, memory and belief.

Signed this the 13th day of May, 2023.

Signature:  30 mm.m. 30

No.: 9546176

Address: Trousdale-Turner Correctional Center VOID 2
140 Macon Way
Hartsville, TN 37074

E.P.J.A. (323)
12501 Montana Ave.
El Paso, TX 79938

Notary: _____

COUNT VIII 1st amendment Denial of Access to Courts
claim Against Sheriff Richard Wiles
Individual an Official compacity
\$500,000 \$500,000

Date: _____

COUNT IX 8th Amendment denial of medical care
Sheriff Richard Wiles Individual Compacity
\$500,000

Count VII 8th Amend. Failure to Protect Claim Based on Deliberate Indifference to Plaintiff Individualized Risk pursuant to 42 U.S.C. 1983
1. Governor of T.N. 2. T.D.O.C. Commissioner, 3. Warden of TTCC, 4. Stewart DIRECTOR, 5. Fairbanks, Wagner, Daily, Chief Harris, 6. Unit Manager Robinson, 7. Case Manager Bail, 8. Spence, 9. Captain Smith, 10. CO# Spence, 11. Leon \$5,000,000 Each Individual Compacity

Count VIII 8th Amend. Violation Failure to Protect Claim Based on deliberate Indifference towards prisoners CO# Spence, Captain Smith, Chief Warden of TTCC, Unit Manager Robinson, Chief Harris, Fairbanks, Wagner, CO# Spence, CO# Leon, T.D.O.C. Commissioner, Governor of T.N., Trinity Food Inc., CO# Leon, T.D.O.C. Commissioner, Governor of T.N.

Count VIII 1st, 8th, 4th Retaliation Claim

Governor of T.N. T.D.O.C. Commissioner, Fairbanks, Wagner, Daily, Leon, Spence, Captain Smith, Chief Harris, Unit Manager Robinson (\$5,000,000 Individual Compacity)

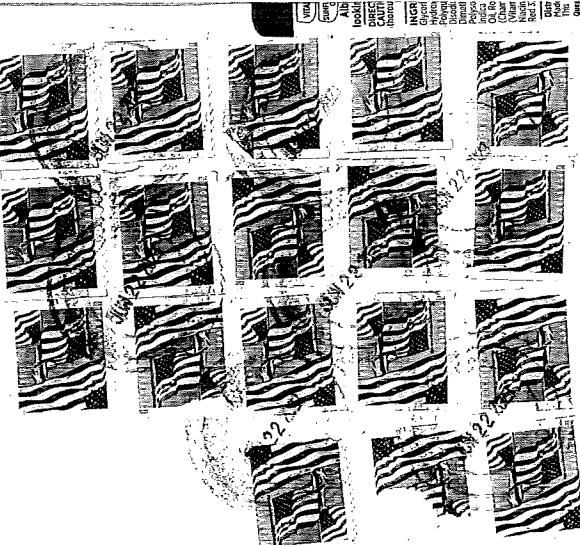
Case 3:23-cv-00081 Document 32 Filed 06/28/23 Page 27 of 32 PageID #: 182

Deborah Newson # 9546176
P.P.J.A. (323)
12501 Montana Ave.
El Paso, Tx. 79938

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3
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